

GHAJAR EXHIBIT 26

11/21/2024

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, ET AL.,)
)
INDIVIDUAL AND REPRESENTATIVE)
PLAINTIFFS,) LEAD CASE NO.
v.) 3:23-cv-03417-VC
)
META PLATFORMS, INC.,)
)
DEFENDANT.)

* H I G H L Y C O N F I D E N T I A L *
* A T T O R N E Y S ' E Y E S O N L Y *

VIDEO-RECORDED DEPOSITION OF AMRISH ACHARYA
VOLUME I
THURSDAY, NOVEMBER 21, 2024
SAN FRANCISCO, CALIFORNIA
9:29 A.M. PST

REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

DIGITAL EVIDENCE GROUP
1730 M. Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 Q. Could you spell that for us, please.

2 A. Yes. A-m-r-i-s-h, and then the last
3 name is A-c-h-a-r-y-a.

4 Q. And what is your home address?

5 [REDACTED]
6 [REDACTED]

7 Q. And are you presently employed?

8 A. Yes.

9 Q. By whom?

10 A. Meta.

11 Q. What is your current title?

12 A. My title currently is director of
13 finance.

14 Q. Does anything follow that title, like a
15 subtitle?

16 A. Senior director of finance.

17 Q. Thank you.

18 Have you testified before?

19 A. I have been deposed before once, yes.

20 Q. All right. Tell me about what case
21 that deposition was in, please.

22 A. I don't precisely remember the specific

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1 A. No. One part of our ads business. So
2 financial supporting one part of our ads
3 business.

4 Q. Understood.

5 And which part was that?

6 A. Ad tech.

7 Q. And if you could take me from there to
8 your current position and tell me the positions
9 that you've obtained since then, that would
10 be --

11 A. Sure. Sure. So for the two years or
12 so after I joined, I supported this ad tech
13 business, which was one part of our ads
14 business, as I noted. We called it publisher
15 solutions.

16 After that I started supporting other
17 bets and new revenue initiatives that Meta was
18 launching at the time, which included Messenger
19 and WhatsApp and others bets within Facebook.

20 After that -- so I did that for about
21 three to three and a half years. After that I
22 was asked to play that role that includes sort

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1 of -- includes finance support for these two
2 messaging apps as well as our core feed apps --
3 so that's Facebook and Instagram as well --
4 which is my current role.

5 Q. And just to back up, you mentioned that
6 you worked on initiatives for new revenue?

7 A. [Inaudible.]

8 Q. I'm sorry. You have to respond
9 verbally --

10 A. Oh, yes. You did say that.

11 Q. -- if you can.

12 A. Yes.

13 Q. And how did you generally track those
14 initiatives' performance?

15 MR. MORTON: Object to form.

16 THE WITNESS: It was through a
17 combination of revenue milestones as well
18 pre-revenue milestones.

19 BY MR. STEIN:

20 Q. What are pre-revenue milestones?

21 A. Have we launched a test product in
22 specific markets to test things out? Are we

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1 A. Not individually, but as part of an
2 overall larger ask, yes.

3 Q. Okay. And as part of that ask work,
4 let's call it --

5 A. Uh-huh.

6 Q. -- did you review any financials
7 related to LLaMA?

8 A. No.

9 Sorry. The only financials I did
10 review was how much our budget was on GenAI.
11 GenAI is the organization at Meta which works
12 and builds Llama. They also do other things.

13 Q. And how much was the budget for GenAI?

14 A. I don't precisely recall.

15 Q. What was the general range of the
16 budget for general AI? Generative. Pardon me.

17 A. Yeah, so we look at budget in terms of
18 two key items, head count and OpEx -- they're
19 two separate -- and the general range, to my
20 recollection, at the time, which was in Q2 of
21 2024, was about [REDACTED] o

22 [REDACTED] in OpEx for the year 2024 for the

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1 GenAI organization.

2 Q. Does that OpEx number include the
3 amount for the heads?

4 A. No. Separate.

5 Q. Okay. Using your knowledge from your
6 time at Meta as to how much these heads
7 generally cost, could you please ballpark about
8 how much you were spending on heads in this
9 context.

10 MR. MORTON: Object to form.

11 THE WITNESS: It's hard to attribute a
12 precise number, because the cost of a head
13 varies on the location, the level and the
14 function.

15 BY MR. STEIN:

16 Q. Okay. Well, using your best estimation
17 of the average here, understanding that it won't
18 be precise, what would you say was cost of those
19 heads?

20 MR. MORTON: Object to form.

21 BY MR. STEIN:

22 Q. And a range is fine.

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1 A. Okay.

2 MR. MORTON: Object to form.

3 THE WITNESS: I would apply a very
4 rough estimate that would be somewhere in the
5 range of about a [REDACTED] in total cost
6 allocated to those heads per head. So that
7 would be [REDACTED] as a
8 very rough estimate.

9 BY MR. STEIN:

10 Q. And does Meta track how much it's
11 spending on generative AI?

12 A. Yes.

13 Q. Does it make that --

14 A. Sorry. To clarify, on the generative
15 AI organization.

16 Q. Correct.

17 Does Meta publish those numbers to the
18 public?

19 A. No.

20 Q. Do you know if they've provided those
21 numbers to Plaintiffs in this case?

22 MR. MORTON: Object to form.

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1 really depend on the year and our priorities and
2 whether the bets that we're making are long-term
3 bets or short-term bets.

4 Q. Would there have been or was there any
5 concomitant [REDACTED] percent increase in revenue
6 projections associated with this ballparked
7 [REDACTED] percent increase in budget ask that came in
8 the middle of 2024?

9 MR. MORTON: Objection. Form.

10 THE WITNESS: We did not refresh or
11 conduct a detailed assessment of GenAI-focused
12 or GenAI-only revenue projections in the out
13 years, and in any case our expectation at the
14 time of setting the budget, which was in October
15 of 2023, was that revenue contributions from
16 GenAI would be [REDACTED] for the foreseeable
17 future, meaning the next two years. And, as a
18 result, there was no refresh of the revenue
19 outlook for GenAI.

20 BY MR. STEIN:

21 Q. Do you recall any discussions at the
22 time, in the middle of this year, 2024, about

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1 revenue projections related to generative AI?

2 A. Yes.

3 MR. MORTON: Object to the...

4 BY MR. STEIN:

5 Q. And what were those discussions?

6 A. So in the second quarter of 2024, which
7 was, you know, through April, May and -- April
8 and May, generally, of this year, we were amidst
9 a long-range planning exercise, as we do every
10 year. As part of that long-range planning
11 exercise, generative AI was a topic that we
12 built a long-range plan for, and as part of that
13 long-range plan for generative AI, we had
14 revenue -- our, you know, revenue estimates in
15 the long term.

16 MR. STEIN: Mark this as Exhibit 643.

17 (Whereupon, Exhibit 643 was
18 marked for identification.)

19 BY MR. STEIN:

20 Q. Do you have Exhibit 643 in front of
21 you, Mr. Acharya?

22 A. I do.

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1 Q. And is this that long-range plan that
2 you just mentioned?

3 A. This document speaks to that revenue
4 outlook -- long-range revenue outlook from GenAI
5 to Meta, yes.

6 Q. And did you prepare this document?

7 A. I did not prepare this document in
8 full, but I was -- I reviewed and was
9 responsible for some portions of this document.

10 Q. Who else prepared this document with
11 you?

12 A. So depending on the specific revenue
13 opportunity, there were different teams that
14 worked on this. In general, this was a
15 combination of teams across finance, across
16 teams that included GenAI itself, across our
17 monetization team, with significant input from
18 other leaders across the company, including our
19 CFO, Susan Li, our chief products officer, Chris
20 Cox, and our CEO, Mark Zuckerberg.

21 Q. Do you understand Mark Zuckerberg to
22 have reviewed this document?

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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) SS.

3

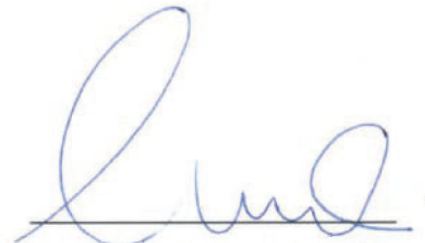
4 I, AUDRA E. CRAMER, CSR No. 9901, in and for the
5 State of California, do hereby certify:

6 That, prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify the truth, the whole truth and nothing but the
9 truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named, and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct and complete transcript
14 of said proceedings;

15 I further certify that I am not interested in the
16 event of the action.

17 Witness my hand this 21st day of November,
18 2024.



19 Certified Shorthand
20 Reporter for the
21 State of California
22